

U.S. Department of Justice

United States Attorney Southern District of New York

86 Chambers Street New York, New York 10007

June 20, 2025

By ECF

The Honorable Valerie Figueredo United States Magistrate Judge Daniel Patrick Moynihan U.S. Courthouse 500 Pearl Street New York, NY 10007

Re: New York Times Co. v. DOD, 22 Civ. 10299 (GHW) (VF)

Dear Judge Figueredo:

The parties write respectfully to provide a status report in the above-named action brought under the Freedom of Information Act ("FOIA"). This action involves FOIA requests submitted by Charlie Savage, a reporter with The New York Times Company (collectively, the "Times"), to the U.S. Department of Defense ("DoD") and its component, the United States Special Operations Command ("SOCOM"). The FOIA requests to DoD have been resolved.

With regard to the FOIA request to SOCOM, the parties met and conferred regarding the records previously produced by SOCOM and DoD. As a result of those discussions, DoD is conducting limited supplemental searches for additional responsive records. DoD produced one additional record on June 18, 2025. DoD will make its best efforts to complete its supplemental searches and make any additional productions within the next 60 days. DoD and SOCOM have also completed review of their prior productions to determine if any further information is appropriate for release. DoD produced limited additional material in two documents on June 18, 2025.

The parties will continue to meet and confer in an effort to narrow or eliminate any issues requiring litigation. The parties respectfully propose to submit a further status report on or before August 19, 2025.

We thank the Court for its consideration of this submission.

Respectfully submitted,

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